

## BDCP RDEIR/SDEIS Review Document Comment Form

**Document:** Administrative Draft—Sect 4 –Alt 4A

**Comment Source:** [Agency]

**Submittal Date:** April 15, 2015

No.	Page	Line #	Comment	ICF Response
1	2	1-9	This language should be changed since there is no longer co-equal goals under Alt 4A as it is not a HCP. The statements are misleading and have not been verified in any prior analysis (except for reduced reliance on So Delta pumps). Simply state DWR/BOR purpose for the Proposed Action. I don't believe the original Purpose and Need for the HCP applies to Alt 4A Sect 7.	
2	2	14	Specify less reliance on So Delta pumps would better protect fish in the "South" Delta. Additional impacts on fish would occur in the North Delta.	
3	3	28-35	It would be nice to somehow corroborate that changes to the project were driven by public comment as the multiple paragraphs above this one suggest. What proportion of comments were positive about the new intakes/operations/design vs negative about CM 2-21? Unless there was a clear indication that CM1 was received positively and the other CM's negatively it is misleading to say comments by the public directed this change. Just state it was in the applicant's best interest to continue the process under Sect 7.	
4	5	11-16	This is not true. The proposed action had changes to certain parts of SWRCB D1641 criteria. One significant change is calculating Delta inflow as what is left after the ND intakes divert. Please clarify this and what other changes from D1641 are part of the proposed action.	
5	16	3-4	For clarity, the Lead Agencies should be spelled out for Alt 4A since it is different then what the Lead Agencies are for the other Alts.	
6	21	17-30	I don't understand what is meant by modeling reference point. Why would the 25,000 acres of tidal restoration be assumed to occur under existing BiOps? Only 8,000 acres are required under the existing BiOps. Why only do a sensitivity analysis for the preferred project (Alt 4A)? Don't you need to do a modeling run based on the project components and assumptions rather than trying to tease out what may be different by using a modeling run that doesn't capture Alt 4A components? It seems this project should have the completed model runs needed to	

			capture it as effectively as possible since it is the project being put forth for a permit. Maybe I am misunderstanding this paragraph.	
7	35	38-40	You are using the terms more positive and less negative to differentiate between yearly flows and April-May. Please clarify these lines.	
8	65	6-8	Not sure I understand this logic. Isn't Delta outflow a driver of Bay salinity so what you really need to assess is changes in outflow as opposed to changes in Delta salinity.	
9	70	26-31	I think this could be worded better. Why would improvements to Yolo increase salmon or steelhead or sturgeon numbers in the project area? Why would improvements in Yolo connectivity increase entrainment? I don't follow what the point is here.	
10	93	general	The public draft needs to include the actual modeling of Alt 4A as opposed to this piecemeal comparison to H3 and H4. I don't think releasing these results to the public allows for an adequate understanding of changes and effects expected under Alt 4A. You are trying to quantify changes in project and modeling from LLT to ELT and with a range of the operations of H3 and H4 and with restoration vs no restoration. The results and interpretations of the complex modeling is difficult enough without subjecting the public to so many deviances from how the project (4A) should be modeled.	
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